

REMARKS

In response to the Office Action dated June 28, 2004, Applicant respectfully requests reconsideration based on the above claim amendments and the following remarks. The amendments to the claims were sufficiently extensive that Applicant merely cancelled the pending claims and added new claims that reflect those amendments. Accordingly, new independent Claim 24 corresponds to cancelled independent Claim 1, new Claim 33 corresponds to cancelled Claim 7, new Claim 41 corresponds to cancelled Claim 12, new Claim 48 corresponds to cancelled Claim 16, and new Claim 55 corresponds to cancelled Claim 20. Applicant respectfully submits that the claims newly presented are in condition for allowance.

At the outset, the undersigned wishes to express gratitude for the courtesies extended by the Examiner at the July 16, 2004 telephonic interview with Applicant's former counsel, Jonathan Parks of Kirkpatrick & Lockhart LLP.

In the Office Action, claims 1-23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,385,650 to Skog et al. ("Skog") in view of U.S. Patent No. 6,507,565 to Taylor ("Taylor"). Applicant has herein presented new claims 24-61 which correspond to the cancelled families of claims as described above. Applicant submits that no new matter has been added. Applicant respectfully traverses the rejections as follows.

As suggested by the Examiner in the telephonic interview, Applicant has added further detail to the mapping module of independent claim 1 (now Claim 24). New independent claim 24 recites, in part, "a mapping module . . . , at least one output of the mapping module . . . comprising: . . . a plurality of customer identifiers assigned to network components to relate each identified customer with network components servicing that identified customer at a lowest

abstraction layer.” Applicant submits that neither Skog nor Taylor, either alone or in combination, teach or suggest, among other things, a mapping module as recited in claim 24.

In the Office Action, the Examiner states that “Skog does not specifically disclose a mapping module in communication with the network element data module and the customer data module.” *See Office Action, page 3.* However, in a prior paragraph of the same page of the Office Action, the Examiner states that Skog teaches a plurality of unique customer identifiers. *See id.* As recited in claim 24, the plurality of customer identifiers are output from the mapping module. Thus, Applicant submits that Skog does not teach or suggest a plurality of unique customer identifiers that are *output* from a mapping module because, as stated by the Examiner, Skog does not teach a mapping module.

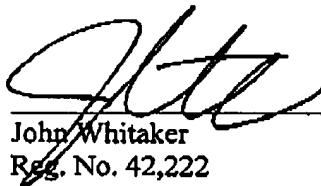
Likewise, Applicant submits that Taylor does not teach or suggest a mapping module. The Examiner identifies the network element 12 of Taylor as being the mapping module. *See id.* However, claim 1 recites “network components” separately from “a mapping module.” Thus, Applicant submits that the network element 12 of Taylor may arguably be equated to the “network components” recited in claim 24, but is not a mapping module.

In view of the foregoing, Applicant submits that independent claim 24, and dependent claims 25-32, which depend therefrom are in condition for allowance. For analogous reasons to those recited above in connection with independent claim 24, Applicant submits that independent claims 33, 41, 48, and 55, and dependent claims 34-40, 42-47, 49-54, and 56-61 which depend therefrom, respectively, are in condition for allowance.

CONCLUSION

Applicant respectfully requests a Notice of Allowance for the pending claims in the present application. If the Examiner is of the opinion that the present application is in condition for disposition other than allowance, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below in order that the Examiner's concerns may be expeditiously addressed.

Respectfully submitted,



John Whitaker
Reg. No. 42,222

LEE & HAYES, PLLC
421 West Riverside
Suite 500
Spokane, WA 99201
(206)315-4001